

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

MICHAEL TOBIAS

PLAINTIFF

V.

**UNKNOWN PERSONS 1 AND 2, HIS WIFE
JANE DOE AND THE CONJUGAL
PARTNERSHIP FORMED BETWEEN
THEM; ABC COMPANY; PAYWARD
VENTURES, INC. DBA KRAKEN BITCOIN
EXCHANGE**

DEFENDANTS

Declaratory Judgment
Preliminary and Permanent Injunction
Theft, Fraud and RICO

PLAINTIFF DEMANDS JURY TRIAL

PLAINTIFFS' MOTION FOR VOLUNTARY DISMISSAL

TO THE HONORABLE COURT:

Now comes Plaintiff **MICHAEL TOBIAS**, by through the undersigned counsel, very respectfully state, allege, and requests:

Plaintiffs hereby request and/or Notify the Honorable Court the Dismissal of the action against **PAYWARD VENTURES, INC. D/B/A KRAKEN BITCOIN EXCHANGE**.

WHEREFORE, it is respectfully requested from this Honorable Court that this Motion **BE GRANTED** and that the present parties to the complaint be **DISMISSED**.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico today January 6, 2023.

I HEREBY CERTIFY: That I on this same date electronically filed the foregoing document with the Clerk of Court for the District of Puerto Rico, through the CM/ECF

electronic filing system, which will provide notification of this filing to the parties involved in the case at bar.

/s/ ALLAN AMIR RIVERA-FERNANDEZ
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